REMARKS

Claims 116-163 are pending in the application.

Claims 116-163 stand rejected.

Claims 116, 118, 122, 128-130, 134, 137-146, 148, 152, 155, 157 and 161 have been amended.

Rejection of Claims under 35 U.S.C. §101

Claims 129-136 and 141-144 stand rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. The aforementioned claims have been amended to address the Examiner's concerns. This rejection is respectfully believed to be overcome thereby.

Moreover, as to claims 129-132, these claims are in "means plus function" form, and so are necessarily statutory. Applicants have amended claim 129 to recite "means plus function" limitations, and so respectfully submit that claims 129-132 are each in "means plus function" form, and so statutory for that reason alone. In this regard, Applicants also respectfully note that claims 129-132 are not "process" claims, as they are referred to in the Office Action. (Office Action, p., section 2) Applicants respectfully assert that the foregoing arguments apply with equal force to claims 133-136.

As to claims 141-144, these claims are directed to a computer program product, and so are also statutory. Applicants have amended claim 137 to claim a computer program product and to recite a computer-readable storage medium, and claims 138-145 to recite a computer program product. Applicants therefore respectfully submit that claims 138-145 each recite a computer program product, and so are statutory for at least this reason. In this regard, Applicants also

respectfully note that neither claims 141-144, nor claims 137-140 nor claim 145, are "process" claims, as they are referred to in the Office Action. (Office Action, p., section 2)

Rejection of Claims under 35 U.S.C. §102

Claims 116-163 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Brogett, U.S. Patent No. 6,581,054 (Brogett).

While not conceding that the cited reference qualifies as prior art, but instead to expedite prosecution, Applicants have chosen to respectfully disagree and traverse the rejection as follows. Applicants reserve the right, for example, in a continuing application, to establish that the cited reference, or other references cited now or hereafter, do not qualify as prior art as to an invention embodiment previously, currently, or subsequently claimed.

Amended independent claim 1 appears below:

116. A method comprising:
generating a set of SQL statements to query a first table and a second table, wherein
the generating uses a relationship between the first table and the second table to construct the set of SQL statements, and
the set of SQL statements comprises SQL statements other than a statement that joins the first and second tables.

Claims 128, 137, 146 and 155 recite substantially comparable limitations.

As will be appreciated, "[a] ... claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art

reference." *Verdegall Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicants respectfully submit that Brogett fails these criteria in several regards.

By contrast to the claimed invention, Brogett is directed to:

> "A method for generating database queries includes storing a predefined query model for querying a database. An accessible portion of the predefined query model is displayed to a user upon request. User edits to the accessible portion of the predefined query model are received and used to generate a user-adapted query model. A query is then initiated based on the user-adapted query model." (Brogett, Abstract)

Thus, the claimed invention is directed to generating a set of SQL statements to query a first table and a second table, *without* having to use an SQL statement that joins the first and second tables. The claimed invention is able to do this using a relationship between the first table and the second table to construct the set of SQL statements. By contrast, Brogett is directed to generating database queries includes storing a predefined query model for querying a database. Applicants respectfully submit that a predefined query model does not anticipate the claimed invention, for at least the reason that nowhere is there taught in Brogett's disclosure a set of SQL statements that comprises SQL statements other than a statement that joins a first and a second table.

Cited in this regard is the following passage from Brogett:

> "Returning to decisional step 230, if unique index information is not available from the database 20, the No branch of decisional step 230 leads to step 232. At step 232, the system administrator manually identifies and links child and

parent tables to generate the predefined query model 56. In this way, the predefined query models 56, are to the extent possible, automatically generated with minimal administrator interaction. It will be understood that database tables and other elements may be otherwise suitably linked." (Brogett, col. 10, 17-24)

Also cited in this regard is Fig. 3 of Brogett, which appears as:

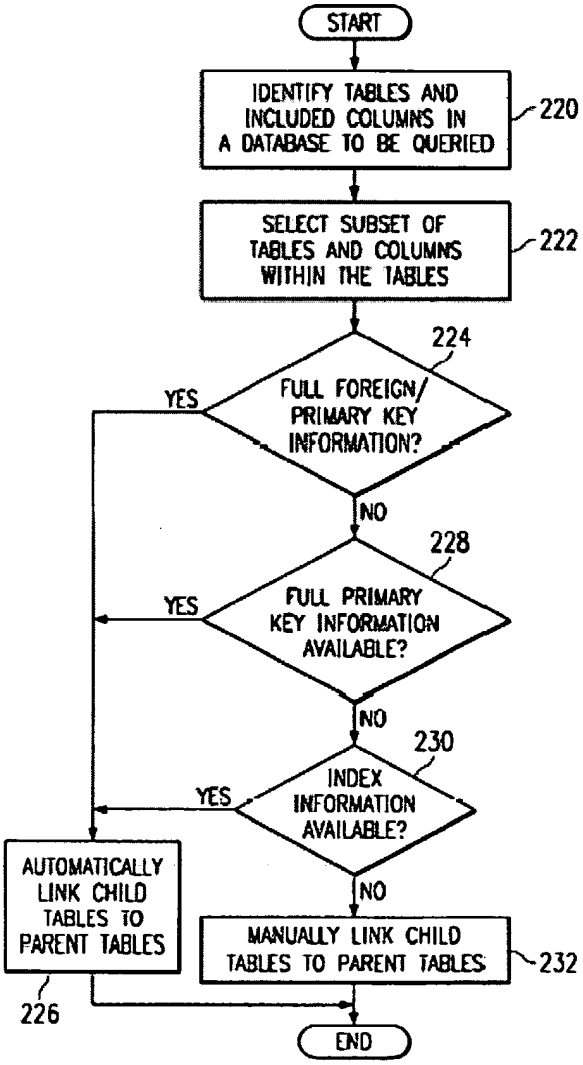

FIG. 3

As can be seen, neither the cited passage nor Fig. 3 show, teach or even suggest a set of SQL statements that comprises SQL statements other than a statement that joins a first and a second table. In fact, in reviewing Fig. 3, there appears no way to proceed from start to end of the flowchart presented therein, without going through a step that causes the parent and child tables to be linked. Either step 226 ("Automatically **Link** Child Tables to Parent Tables"; Emphasis supplied) or step 232 ("Manually **Link** Child Tables to Parent Tables"; Emphasis supplied) must be executed. Not only does Brogett fail to teach a set of SQL statements that comprises SQL statements other than a statement that joins a first and a second table, Brogett teaches that such tables must be joined ("linked").

Applicants have amended independent claims 116, 128, 137, 146 and 155 to clarify the foregoing distinction, and so these claims now recite:

> "...
> the set of SQL statements comprises SQL statements other than a statement that joins the first and second tables."

Applicants respectfully submit, therefore, that amended independent claims 116, 128, 137, 146 and 155 are allowable over Brogett and Applicants respectfully urge the Examiner to withdraw the §102 rejection of these claims. Applicants further respectfully submit that dependent claims 117-127, 129-136, 138-145, 147-154 and 156-163 are allowable as depending upon allowable base claims in addition to being allowable for various other reasons.

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CONCLUSION

Applicants submit that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia 22313-1450, on February 28, 2007.

Attorney for Applicant — Date of Signature 2/28/07

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